

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETER ROMANOV,

Plaintiff,

v.

TRANS UNION, LLC; *et al.*,

Defendants.

Case No. 1:24-cv-01901-JPO

**PLAINTIFF'S RESPONSE TO DEFENDANT
EXPERIAN INFORMATION SOLUTIONS, INC.'S
MOTION TO COMPEL ARBITRATION**

Plaintiff Peter Romanov, through undersigned Counsel, advises the Court that Plaintiff does not oppose Defendant Experian Information Solutions, Inc.'s motion to compel arbitration (ECF 35). Plaintiff further states:

Because Plaintiff disagrees that he is bound to arbitrate his claims against Experian or that the law requires him to do so, this notice of non-objection is made without waiving any argument or objection to the scope of the arbitration clause or any argument that Plaintiff may decide to make to the Arbitrator regarding threshold questions of arbitrability.

ACCORDINGLY, Plaintiff serves notice that he does not object to Defendant Experian Information Solutions, Inc.'s motion to compel arbitration and to a stay of this action as to Experian Information Solutions, Inc. only pending the outcome of the arbitration proceeding.

Dated: February 18, 2025
New York, New York

Respectfully submitted,

/s/ Craig C. Marchiando.

Craig C. Marchiando

CONSUMER LITIGATION ASSOCIATES

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